## REMARKS

Applicants request favorable reconsideration and withdrawal of the rejections set forth in the above-noted Office Action in light of the foregoing amendments and the following remarks.

Claims 1-26 are presented for examination, of which Claims 1 and 12 are in independent form. Claims 1, 12, 17, and 20-23 have been amended herein. Individual support for the amendments may be found throughout the originally-filed disclosure, including, for example, at paragraph [0024] of the specification.

The Office Action rejects Claims 1-26 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0049853 (Chu).

These rejections are respectfully traversed. Nonetheless, without conceding the propriety of the rejections and solely to advance prosecution, Applicants have amended independent Claims 1 and 12 to further clarify the present invention in view of <u>Chu</u>, and submit that Claims 1 and 12, and the claims dependent thereon, are patentably distinct from Chu for at least the following reasons.

The Office Action considers a file compression performed by <u>Chu</u> to read on the reformatting of file content, a feature previously recited by Claim 1. In doing so, the Office Action relies on the Microsoft Press Computer Dictionary, 3rd ed., which defines the act of "compressing" as "...removing repeated patterns of bits and replacing them with some form of summary that takes up less space" (emphasis added).

As amended, Claim 1 recites, *inter alia*, a file transformation component configured to perform file conversions, and validate and enrich file content using enterprise logic. The Microsoft Press Computer Dictionary, 3rd ed., defines file

conversion as "[t]he process of transforming the data in a file from one format to another without altering its contents..." (emphasis added). Therefore, the file transformation component of Claim 1 can be configured to transform data in file from one format to another without altering its contents.

The <u>Chu</u> application fails to teach or suggest a file transformation component configured to perform file conversions. As the Office Action concedes, the file compression performed by <u>Chu</u> requires both a removal of repeated patterns of bits and a replacement of the repeated patterns with a summary of some form. Each of these required acts involve altering the contents of a file. File conversion, on the other hand, is a transformation without altering the contents of a file. Thus, <u>Chu</u> fails to read on the performance of file conversion, and therefore the reference fails to teach or suggest a file transformation component as recited by Claim 1. Accordingly, Applicants submit that Claim 1 is not anticipated by <u>Chu</u>, and respectfully request withdrawal of the rejection.

The <u>Chu</u> application also fails to teach or suggest the method recited by Claim 12. Among the features recited by Claim 12 is the file conversion of a file. As discussed above with respect to Claim 1, while <u>Chu</u> may read on altering the contents of a file, the citation fails to disclose the file conversion of a file. Therefore, Claim 12 is also believed to be patentable.

The remaining rejected claims in this application depend from either Claim 1 or Claim 12, and are thus submitted to be patentable for at least the same reasons. Because each dependent claim also is deemed to define an additional aspect of the invention, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

Accordingly, in light of the foregoing amendments and remarks, Applicants request entry of this amendment as well as favorable reconsideration, withdrawal of the foregoing rejections and an early Notice of Allowance.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Lawrence A. Stahl/

Lawrence A. Stahl Attorney for Applicants Registration No. 30,110

FITZPATRICK, CELLA, HARPER & SCINTO 30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

FCHS\_WS 2036425\_1.DOC